

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

GOBIND SINGH, M.D., PH.D.,)	
)	
Plaintiff,)	
)	Case No. 3:17-cv-00400
v.)	
)	District Judge Richardson
VANDERBILT UNIVERSITY)	Magistrate Judge Holmes
MEDICAL CENTER and)	
VANDERBILT UNIVERSITY,)	JURY DEMANDED
)	
Defendants.)	

NOTICE OF ATTORNEY’S CHARGING LIEN

Pursuant to Tenn. Code Ann. §23-2-103, please take notice that Justin S. Gilbert of Gilbert Law, PLC, gives notice of a charging lien for services rendered and expenses incurred during the representation of Plaintiff Gobind Singh in this matter.

1. Mr. Gilbert has invested substantial time and resources pursuing Plaintiff’s matter, including overcoming summary judgment as to all claims, *Singh v. Vanderbilt Univ. Med. Ctr.*, 2020 U.S. Dist. LEXIS 7713 (M.D. Tenn. Jan. 16, 2020) and, thereafter, engaging in lengthy attempts at alternative dispute resolution.

2. “As a representative of clients, a lawyer performs various functions: [Advisor, Advocate, Negotiator, and Evaluator].”¹ Mr. Gilbert *advised* about the case, strategies, risks, and

¹ “As a representative of clients, a lawyer performs various functions. As an advisor, a lawyer provides a client with an informed understanding of the client’s legal rights and obligations and explains their practice implications. As an advocate, a lawyer zealously asserts the client’s position under the rules of the adversary system. As a negotiator, a lawyer seeks a result

goals. Mr. Gilbert *advocated* Dr. Singh's position, steering the case to trial for every claim. Mr. Gilbert *negotiated* with a tough adversary, with assistance of a skilled mediator, for well over a week. Mr. Gilbert *evaluated* the client's legal matter and reported to him. The parties have not reached a settlement at this juncture. Unfortunately, during the recent negotiation and evaluations, Mr. Gilbert and Dr. Singh have encountered relationship barriers affecting Mr. Gilbert's continued representation.

WHEREFORE, notice is hereby given to all interested or affected parties and persons of the attorney's charging lien against any recovery or proceeds obtained by Plaintiff.

Respectfully submitted,

GILBERT LAW, PLC

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advantageous to the client but consistent with requirements of honest dealings with others. As an evaluator, a lawyer acts by examining a client's legal affairs and reporting about them to the client or to others." RPC 8 [3].

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served on the attorneys listed below by electronic means via the Court's electronic filing system on July 2, 2020, including the following:

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